

Log of B-160-03 Comments and Responses
Ecosystem Restoration

12/5/2003

Commentor	Date of Comment	Draft Date	Chapter &Section	Comment	Response
Ag Water Caucus E-mail	9/23/2003	8/29/2003	5, Ecosystem Restoration, Whole Narrative	Nowhere is efficiency discussed in ecosystem restoration. Why is this segment not expected to use water as efficiently as possible?	X A new issue has been added that deals with efficiency.
Ag Water Caucus E-mail	9/23/2003	8/29/2003	Ch 5, Ecosystem Restoration, Introduction	Page 5-1, paragraph 2 – This paragraph suggests the passage of Propositions 204, 13 and 50 were primarily because of the desire of the public to improve ecosystem conditions. Proposition 204 was entitled: "Safe, Clean, Reliable Water Supply Act." Proposition 13 was entitled: "Safe Drinking Water, Clean Water, Watershed Protection, and Flood Protection Bond Act." Proposition 50 was titled: Water Security, Clean Drinking Water, Coastal And Beach Protection Act." In fact, these titles do not suggest that ecosystem conditions were the driving force behind the public's support for the propositions and strike this reader as revisionist history. Rewrite the paragraph to state the fact that these propositions provided significant funding for ecosystem and water supply projects.	X Agreed; sentence has been modified.
Ag Water Caucus E-mail	9/23/2003	8/29/2003	5, Ecosystem Restoratoin, Introduction	Page 5-1, paragraph 3 – The last sentence: "Since that time, development and implementation of the CALFED Bay-Delta Program has demonstrated that integrated resource management – improving water supply reliability while simultaneously restoring ecosystems – is far more likely to succeed than pursuit of single purpose projects." This promise of CALFED is yet to be achieved. While over \$400 million has been spent on ecosystem restoration, not all of that money has actually benefited the ecosystem. A substantial amount of funding has been granted for education and outreach projects and programs. There have also been substantial investments in groundwater storage programs aimed at improving dry year water supplies. However, the main water supply reliability projects of CALFED, such as increasing pumping at the H.O. Banks pumping plant to 8,500 cfs, have yet to be fulfilled. This paragraph should be rewritten to state that the CALFED Program is intended to improve water supply reliability while simultaneously restoring ecosystems.	X Agreed; text has changed to match proposed wording.
Ag Water Caucus E-mail	9/23/2003	8/29/2003	5, Ecosystem Restoratoin, Introduction	Page 5-2, paragraph 1 – The sentence, "Future water management efforts will face conflict and opposition unless these efforts are accompanied by ecosystem restoration actions that mitigate for project impacts and go well beyond mitigation to contribute to the restoration of ecosystem health" sounds like a threat. Does this mean the State will try to block local projects for which proper environmental documentation has been done that incorporates project mitigation, but doesn't go beyond it? This kind of statement has no place in the CWP and it must be deleted.	X Sentence has been modified.

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Ag Water Caucus E-mail	9/23/2003	8/29/2003	5, Ecosystem Restoratin, Introduction	Page 5-2, paragraph 2 – This paragraph lays primary responsibility for restoring ecosystems on the backs of “water managers.” In fact, provision of “appropriate water supply, flow rate or flow pattern” for ecosystem restoration often has deleterious impacts on the water managers’ customers (i.e., reoperation of New Melones Reservoir to primarily provide environmental flows under CVPIA has shifted releases from the Spring to the Fall, resulting in quality degradation in the San Joaquin River in the Fall). The paragraph should be more balanced in the role of water managers in ecosystem restoration.	Y Restoration is the responsibility of water managers where ecosystems are affected by water projects. That dual responsibility provides balance.
Ag Water Caucus E-mail	9/23/2003	8/29/2003	5, Ecosystem Restoratin, Introduction	Page 5-2, paragraph 5 – Increases in Delta exports are identified as a contributor to ecosystem declines. Modify the sentence to read: “increases in Delta exports and upstream diversions.”	X Sentence has been changed.
Ag Water Caucus E-mail	9/23/2003	8/29/2003	5, Ecosystem Restoration, Current Status	Page 5-3, paragraph 1 – The last sentence points out the impacts of dams on the downstream stretch of rivers. It should also be pointed out that the downstream stretch of rivers often are benefited in terms of sport fisheries, such as trout and bass. Especially in the case of trout, the tailwaters below dams often make it possible to fish year-round, thus increasing public trust and environmental justice values associated with the river. This should be pointed out, and the paragraph not be salmon specific.	Y The topic of the paragraph is ecosystem decline.
Ag Water Caucus E-mail	9/23/2003	8/29/2003	5, Ecosystem Restoration, Current Status	Page 5-3, paragraph 3 – The sentence: “When the impacts would occur in aquatic ecosystems that are already severely degraded, it may be difficult if not impossible for single purpose projects to avoid endangered species conflicts and nearly impossible to build societal consensus that the project should be implemented,” is confusing and should be deleted.	X Sentence has been simplified.
Ag Water Caucus E-mail	9/23/2003	8/29/2003	5, Ecosystem Restoration, Current Status	Page 5-3, paragraph 3 – The paragraph further identifies increased exports from the Delta as focusing opposition. Sentences such as this strongly suggest the state’s position on Delta exports vis-à-vis the CWP is to oppose increases. This is contrary to the contractual commitments the state has with its SWP contractors, as well as the South Delta Improvement Program, which DWR is now developing environmental documentation for. The bias in this paragraph should be removed.	Y The paragraph reports, accurately, that some people oppose increased exports. This reflects their bias, not that of DWR.
Ag Water Caucus E-mail	9/23/2003	8/29/2003	5, Ecosystem Restoration, Current Status	Page 5-4, paragraph 1 – The sentence: “The result is also a more resource efficient way to implement projects, such as the CALFED Ecosystem Restoration Program.” should be deleted. It is unclear at the moment whether the CALFED Ecosystem Restoration Program will result in cost effective water supplies.	X Clause deleted.
Ag Water Caucus E-mail	9/23/2003	8/29/2003	5, Ecosystem Restoration, Current Status	While protecting certain resources for the public, it is also important to feed those people.	Y No response needed.

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Urban Water Caucus E-mail	10/15/2003	8/29/2003	5, Ecosystem Restoration, Potential Costs	Ecosystem Restoration, Costs of Ecosystem Restoration, in general carries a tone of blaming water managers and water projects for "damaging" ecosystems. Some example: Under Water Supply Costs, "An important way to reduce the need...is to incorporate ecosystem protection into water projects at the outset. This can reduce or eliminate the need for retrofits and mitigation." Seems contradictory to CEQA, and NEPA when applied, requires avoidance of adverse impact if possible and mitigation if not. Under Major Issues, Single-purpose planning, "Water managers incline toward single-purpose projects because..." Contradicts the statement in the Floodplain Management section, "Instead, governmental agencies and the private sector are likely to garner the resources and public support for projects only if they achieve multiple benefits."	X The two sentences under Water Supply Costs have been deleted. Both the ecosystem restoration and floodplain management strategies note that single-purpose projects prove to be unpopular. Wording has been softened.
Ag Water Caucus E-mail	9/23/2003	8/29/2003	ecosystem restoration--major issues	Concerning scientific uncertainty: take no action without sound science to support it and a way to measure success/failure	We have the science and ways to measure success and failure; we lack power to predict outcomes accurately.
Ag Water Caucus E-mail	9/23/2003	8/29/2003	ecosystem restoration--major issues	Concerning sound, accessible data: DWR should not recommend restoration or management programs with public funds until success criteria have been established.	Y No response needed: the issue concerns a consolidated statewide reporting system.
Ag Water Caucus E-mail	9/23/2003	8/29/2003	ecosystem restoration-recommendations	On integrated resources planning: it is inappropriate for DWR to single itself out as adopting such a sweeping new policy, i.e., treating ecosystem restoration as a coequal objective in water projects.	X The word coequal has been deleted.
Ag Water Caucus E-mail	9/23/2003	8/29/2003	ecosystem restoration--recommendations	On funding uncertainty: simply state what CALFED ROD says about user fees, and mention that bond propositions are another means of reducing funding uncertainty.	The ROD has been quoted.
Environmental caucus	10/1/2003	"September dra	ecosystem restoration-general	Expand discussion of endangered species; include their impact on water management	ESA species are specified on p. 2, lines 33-38. Their impact is a theme of the chapter. See p.1, paragraph 4; p.2, last paragraph; p.3, paragraphs 2 and 3; and p.4, first paragraph.
Environmental caucus	october	9/8/2003	current condition	Note on public trust responsibilities is inadequate. Reference other chapters.	p.3, lines 29-46 cover the subject and contain a reference to chapters 2 and 4.
John Mills	10/14/2003	9/8/2003	recommendations	Under "assessment of environmental flows", define "healthy river requirements".	X Clause deleted.
Environmental caucus	October	9/8/2003	issues	Note that urban sprawl reduces ecosystem space.	This idea is covered in the strategy for floodplain management.
Diana Jacobs, Department of Fish & Game	December	12/1/2003	recommendations	Under "scientific uncertainty", rewrite to say that Agencies and departments should work together to ensure independent science in decision-making.	X Sentence has been rewritten
various	November-Dec.		issues	Incorporate environmental water use efficiency as a major issue	X See new issue statement - "Efficiency of restoration actions"

Response Key

Symbol	Significance
X	"See Text"
Y*	"Not Adopted"
N/A*	"Comment Does Not Apply to Text"